

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

UNITED STATES OF AMERICA,

Plaintiff,

v.

A 1988 BLACK MERCEDES BENZ  
AUTOMOBILE, MODEL 300E, FOUR  
DOOR SEDAN, IDENTIFIED BY  
VIN #WDBEA30D3JA688786,  
LICENSE PLATE #2380LEM,

Defendant.

NO.

VERIFIED COMPLAINT FOR  
FORFEITURE IN REM

COMES NOW the United States of America, by and through Jenny A. Durkan,  
United States Attorney for the Western District of Washington, and Richard E. Cohen,  
Assistant United States Attorney for said District, and alleges:

**I. NATURE OF THE ACTION**

1. This is a complaint for seizure and forfeiture of: A 1988 black Mercedes  
Benz automobile, model 300E, four door sedan, identified by VIN  
#WDBEA30D3JA688786, License Plate #2380LEM (hereinafter "defendant vehicle").  
The defendant vehicle is currently registered in the State of Washington to Chantelle  
Victor, of Seattle, WA 98178.

2. This Court has jurisdiction over this action pursuant to Title 28, United  
States Code, Section 1345, and Title 21, United States Code, Section 1355.

3. This Court has venue pursuant to Title 28, United States Code, Section 1395, Title, 28, United States Code Section 881(j), and Title 18, United States Code, Section 2254.

4. The defendant vehicle is now and during the pendency of this action will be within the jurisdiction of this Court.

## II. LEGAL BASIS FOR FORFEITURE

5. The defendant vehicle is property derived from proceeds traceable to the crimes of Computer Fraud and Abuse, Wire Fraud, Identify Fraud, and Aggravated Identity Theft, in violation, respectively, of Title 18, United States Code, Sections 1030(a)(4) and (a)(5)(A), 1343, 1028(a)(7), and 1028(A), and also was used to facilitate the commission of the listed crimes. The defendant vehicle is therefore subject to seizure by, and forfeiture to, the United States of America, pursuant to Title 18, United States Code, Section 981(a)(1)(C).

## III. FACTUAL BASIS FOR FORFEITURE

6. Beginning at a time unknown, but not later than October 5, 2010, John E. Griffin, and others knowingly and with intent to defraud, accessed a protected computer without authorization, or exceeded authorized access, and by means of such conduct furthered the intended fraud and obtained a thing of value, in violation of Title 18, United States Code, Sections 1030(a)(4).

7. Beginning at a time unknown, but not later than October 5, 2010, John E. Griffin, and others knowingly caused the transmission of a program, information, code, or command, and as a result of such conduct, intentionally caused damage without authorization, to a protected computer, in violation of Title 18, United States Code, Section 1030(a)(5)(A).

8. Beginning at a time unknown, but not later than October 5, 2010, John E. Griffin, and others knowingly transferred, possessed, or used, without lawful authority, a means of identification of another person with the intent to commit, or to aid or abet, or in connection with, any unlawful activity that constitutes a violation of Federal law, or that

1 constitutes a felony under any applicable State or local law, in violation of Title 18,  
2 United States Code, Section 1028(a)(7).

3 9. Beginning at a time unknown, but not later than October 5, 2010, John E.  
4 Griffin, and others, having devised or intending to devise a scheme or artifice to defraud,  
5 or for obtaining money or property by means of false or fraudulent pretenses,  
6 representations, or promises, transmitted or caused to be transmitted by means of wire  
7 communication in interstate commerce, writings, signs, signals, pictures, or sounds for the  
8 purpose of executing such scheme or artifice, in violation of Title 18, United States Code,  
9 Section 1343.

10 10. Beginning at a time unknown, but not later than October 5, 2010, John E.  
11 Griffin, and others, during and in relation to a felony violation enumerated in Title 18,  
12 United States Code, Section 1028(c), knowingly transferred, possessed, or used, without  
13 lawful authority, a means of identification of another person, in violation of Title 18,  
14 United States Code, Section 1028A.

15 11. The facts supporting forfeiture of the defendant vehicle are as set forth in  
16 Exhibit A, Affidavit of United States Secret Task Force Officer Chris Hansen, which is  
17 attached hereto and incorporated as if fully set forth herein.

#### 18 IV. CONCLUSION

19 12. By reason of the foregoing, there is probable cause to believe that the  
20 defendant vehicle is property derived from proceeds traceable to the crimes of Computer  
21 Fraud and Abuse, Wire Fraud, Identify Fraud, and Aggravated Identity Theft, in violation,  
22 respectively, of Title 18, United States Code, Sections 1030(a)(4) and (a)(5)(A), 1343,  
23 1028(a)(7), and 1028(A), and also was used to facilitate the commission of the listed  
24 crimes. Therefore, pursuant to Title 18, United States Code, Section 981(a)(1)(C), the  
25 defendant vehicle is subject to forfeiture to the United States of America.

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**RICHARD E. COHEN**  
Assistant United States Attorney  
United States Attorney's Office  
700 Stewart Street, Suite 5220  
Seattle, WA 98101-1271  
Telephone: (206) 553-2242  
Fax No.: (206) 553-6934  
E-mail: [Richard.E.Cohen@usdoj.gov](mailto:Richard.E.Cohen@usdoj.gov)


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VERIFICATION OF COMPLAINT

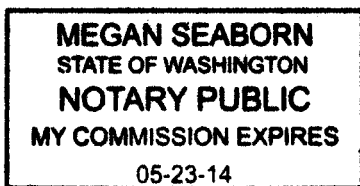
STATE OF WASHINGTON }  
COUNTY OF KING } ss


I, Chris Hansen, declare under penalty of perjury that the following is true and correct to the best of my knowledge:

I am a United States Secret Service Task Force Officer, and am assigned to this case. I have read the attached Complaint and know the contents thereof; I have furnished the information contained in the Complaint based upon my own investigation and that of other reliable official Government sources; and, based on information and belief, the allegations contained in the Complaint are true.

  
Chris Hansen  
Task Force Officer  
United States Secret Service

SUBSCRIBED and SWORN to before me this 13 day of April, 2011, by Chris Hansen.



  
Print: Megan Seaborn  
Notary Public in and for the  
State of Washington, residing  
at Seattle, WA  
Expires: 5/23/14